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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:

THE LITIGATION PRACTICE GROUP, P.C.,  
  
Debtor.

Chapter 11

Case No: 8-23-bk-10571-SC

Adv. Proc. No. 8:23-ap-01098-SC

OHP-CDR, LP, a Texas Limited Partnership and  
PURCHASECO 80, LLC, a Texas Limited  
Liability Company,

Plaintiffs

v.

RICHARD A. MARSHACK, Chapter 11 Trustee  
and AZZURE CAPITAL, LLC, a New York  
Limited Liability Company.

Defendants.

**STIPULATION TO CONTINUE STATUS  
CONFERENCE**

Date: February 7, 2024  
Time: 1:30 p.m.  
Courtroom: 5C

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,  
THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

This Stipulation (“Stipulation”) is entered into by and between Richard A. Marshack, in his capacity as Chapter 11 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of The Litigation Practice Group P.C. (“Debtor”), OHP-CDR, LP (“OHP”) and PurchaseCo80, LLC (“PurchaseCo”), and Azzure Capital, LLC (“Azzure”) (collectively Trustee, OHP, PurchaseCo, and Azzure are referred to herein as the “Parties”).

**RECITALS**

A. On March 20, 2023, Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code, initiating bankruptcy Case No. 8:23-bk-10571-SC in the United States Bankruptcy Court for the Central District of California, Santa Ana Division.

B. On September 11, 2023, OHP-CDR and PurchaseCo filed a *Complaint to Determine Priority of Lien and Ownership Interest*. ECF 1.

C. On October 13, 2023, the Trustee filed an answer and counterclaims. ECF 7.

D. On October 13, 2023, Azzure filed an answer. ECF 10.

E. On November 3, 2023, OHP-CDR and PurchaseCo filed an answer to the counterclaims. ECF 13.

F. On November 22, 2023, the parties filed a joint status report indicating that there were ongoing settlement discussions and requested a continuance of the status conference. ECF 17.

G. The Court continued the status conference to February 7, 2024 at 1:30 p.m. ECF 18, 19.

H. OHP-CDR, PurchaseCo, and the Trustee are still in settlement discussions and desire to continue the status conference so that the parties can try to reach a settlement.

**STIPULATION**

Wherefore, the Parties agree and STIPULATE as follows:

1. The February 7, 2024 status conference be continued for approximately one month to March 13, 2024 at 11:00 a.m., or such other time that is convenient for the Court;

2. The Parties will file a joint status report 14 days before the continued status conference;

3. Except as specifically set forth herein, the Parties reserve all other rights, claims and defenses; and

4. This Stipulation may be executed in one or more counterparts and facsimile electronic signatures may be used in filing this document with the Court.


1 DATED: January 24, 2024

DINSMORE & SHOHL llp

2  
3 By:   
4 CHRISTOPHER CELENTINO  
5 Special Counsel for  
6 RICHARD A. MARSHACK


7 DATED: January 24, 2024

QUINN EMANUEL URQUHART & SULLIVAN LLP

8 By:   
9 RAZMIG Y. IZAKELIAN  
10 Attorneys for  
11 OHP-CDR, LP and PURCHASECO 80, LLC

12 DATED: January 24, 2024

BRYAN CAVE LEIGHTON PAISNER LLP

13 By:   
14 SHARON Z. WEIS  
15 Attorneys for  
16 AZZURE CAPITAL, LLC  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

865 S. Figueroa Street, 10<sup>th</sup> Floor, Los Angeles, CA 90017

A true and correct copy of the foregoing documents entitled: Stipulation to Continue Status Conference

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* January 24, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/24/2024  
Date

Razmig Izakelian  
Printed Name

/s/ Razmig Izakelian  
Signature

Razmig Izakelian on behalf of Plaintiff OHP-CDR, LP  
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